

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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:
UNITED STATES OF AMERICA :

-v.- :

RYAN SALAME, :

Defendant. :

**DECLARATION IN SUPPORT
OF A PARTIAL VACATUR OF
THE CONSENT PRELIMINARY
ORDER OF FORFEITURE AS TO
CERTAIN SUBSTITUTE ASSETS**

: S7 22 Cr. 673 (LAK)
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SAMUEL RAYMOND, pursuant to Title 28, United State Code, Section 1746,
declares under penalty of perjury as follows:

1. I am an Assistant United States Attorney in the office of Damian Williams, United States Attorney for the Southern District of New York, and attorney for the Government herein. I am responsible for the above-captioned matter, and as such, I am familiar with the facts and circumstances of this proceeding. This declaration is submitted in support of the Government's motion for entry of a Partial Vacatur of the Preliminary Order of Forfeiture in the above-captioned case.

2. On or about September 7, 2023, the Court entered a Consent Preliminary Order of Forfeiture as to Substitute Assets/Money Judgment (the "Preliminary Order of Forfeiture") (D.E. 268), which ordered, among other things: (1) that RYAN SALAME (the "Defendant") make payment to the United States of \$6,000,000 by the date of the Defendant's sentencing in this case (the "Payment"); (2) forfeiture to the United States of all right, title and interest of the Defendant's interest in a 2021 Porsche 911 Turbo S with VIN number WP0AD2A94MS257710 (the "Subject Asset").

3. Since the entry of the Preliminary Order of Forfeiture, the Defendant has determined that he will require (a) several additional days to transfer certain digital assets to the Government; and (b) additional time to complete the sale of another asset in the next several months, to satisfy the Payment in full.

4. Since the entry of the Preliminary Order of Forfeiture, the Government has determined that there is insufficient equity in the Subject Asset to further pursue forfeiture to the Government.

5. The Government and the Defendant have agreed that the Defendant will pay the Payment in full by September 3, 2024.

6. The Government and Defendant have agreed that the Government will return the Subject Asset to the Defendant, and that the Defendant will pay as additional forfeiture the costs of maintaining the Subject Asset since it was provided to the Government, which are \$1,480.74.

7. Accordingly, the Government requests the Preliminary Order of Forfeiture be vacated as to the due date of the Payment and as to the Subject Asset, be amended to require that the Defendant pay an additional \$1,480.74, and to require the Defendant to pay the Payment and the additional monies by September 3, 2024, and that it shall in all other respects remain in effect.

8. No previous application for the relief requested herein has been sought.

Dated: New York, New York
May 27, 2024

DAMIAN WILLIAMS
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Southern District of New York

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